

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
)	
v.)	CRIMINAL NO. 03-30008-MAP
)	
)	
JOSE MERCED, et al)	
)	
Defendants.)	

THE GOVERNMENT'S MOTION TO EXTEND TIME FOR
FILING ITS RESPONSE TO DEFENDANTS' MOTIONS TO SUPPRESS

The United States of America, by Michael J. Sullivan, United States Attorney for the District of Massachusetts, respectfully requests an additional ten days from October 15, 2004, until October 25, 2004, to submit its response to the defendants' motions to suppress. In support of its motion the government states the following:

1. Defendants Daniel Almonte, Charles Winston and Cirillo Delgado have filed various motions including motions to suppress statements, physical evidence and wire communications. Defendants Almonte and Delgado have also filed motions to sever. These motions were received on October 1 (Winston), October 4 (Almonte) and October 13, 2004 (Delgado).

2. The government's response is due on October 15, 2004. Based upon undersigned counsel's review of the issues raised by these defendants, the government needs additional time to

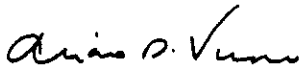
research and prepare its response.

Wherefore, the government respectfully requests that it be permitted to submit its response to defendants' motions to suppress on October 25, 2004.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By:


Ariane D. Vuono
Assistant U.S. Attorney

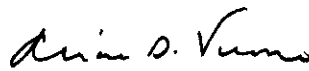
Dated: October 15, 2004

CERTIFICATE OF SERVICE

Hampden, ss.

Springfield, Massachusetts
October 15, 2004

I, Ariane D. Vuono, Assistant U.S. Attorney, do hereby certify that I have served a copy of the foregoing by mail on David Wenc, Esq., 44 Main Street, Box 306, Windsor Locks, CT 06096; David Hoose, Esq., 1145 Main Street, Springfield, MA 01103; and Alan Black, Esq., 1383 Main Street, Springfield, MA 01103.


Ariane D. Vuono
Assistant U.S. Attorney